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## Memorandum

**To:** SC Registered Infectious Waste Transporters and affected facilities

**From:** Susan E. Jenkins, Manager *SEJ*  
Infectious and Radioactive Waste Management Section  
Bureau of Land and Waste Management

**Subject:** Transporting Non-regulated Waste

**Date:** February 2, 2011

This memo is to provide information about amended requirements for generator registration numbers on infectious waste manifests. It is being sent to clarify these requirements for transporters and their customers. SC Infectious Waste Management Regulations R.61-105, were recently amended on June 25, 2010 and one of the changes was to allow transporters to pick up waste from generators who do not have a Department identification number (refer to Section M.1.b.)

Registered transporters may pick up waste from facilities that are not required to be registered with the Program as a generator of infectious waste, whether they are registered or not. However, this waste must NOT MEET the definition of regulated infectious waste, but must present a possible risk to public health or the environment (e.g. waste from veterinarians, body art studios, crime-scene cleaners). The Department reserves the right to determine how individual waste fits into this category. However, solid waste generated by a registered generator of infectious waste must be segregated as close to the point of generation as practical.

As always, when a transporter picks up waste that does meet the regulatory definition of infectious waste, the generating facility must be registered with the Program and the Department identification number must be on the manifest. The definition of regulated infectious waste comes from Section E.1.a.-h.

Please remember that if a transporter transports or stores solid waste in the same cargo-carrying body as infectious waste, each waste must be managed as infectious waste and must accompany a properly completed manifest. (refer to Section Q.2. and R.1.)

Therefore, all waste picked up by a registered transporter, no matter the source, must be manifested. However, the manifests for waste picked up from facilities that are not required to be registered do not have to include a generator registration number.

When transporters pick up waste from a facility that does generate regulated infectious waste, the manifest for this waste must still include the generator's infectious waste Program registration number.

The South Carolina Infectious Waste Program web site is: <http://www.scdhec.gov/infectiouswaste>.